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VIA ELECTRONIC CASE FILING

Honorable Nusrat J. Choudhury
United States District Court Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Etienne v. Locust Valley UFSD, Kimberly Gotti and Gianna Gotti*
Docket No.: 25-cv-00724 (NJC)(SIL)

Dear Judge Choudhury:

As you are aware, we are the Attorneys representing the Plaintiffs in the above referenced matter. We write in response to the letter of Patrick C. Carroll, Esq. dated April 21, 2025 which was filed with the Court on May 1, 2025. Defendants seek relief from the Court in the form of an order requiring the disclosure from their co-defendants for discovery in the form of the entire Notice of Claim file. Upon our seeing that letter, we were clear that the Gotti Defendants were seeking this information without any attempt to meet and confer. While Defendants argue that there is a need for the Notice of Claim file and 50h transcript at this time, we disagree as there is no plausible argument that Defendants need the 50h transcript to formulate their Rule 12(b)(6) motion. Accordingly, we ask the Court to deny the Defendants' application at this point.

Respectfully submitted,

Frederick K. Brewington

FREDERICK K. BREWINGTON

cc: All Counsel (Via ecf)
FKB:cmp